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March 17, 2020

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## **VIA EMAIL AND ECF**

The Honorable William F. Kuntz United States District Court Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: <u>United States v. Detelina Subeva</u> (18-CR-681)

Dear Judge Kuntz:

We represent Detelina Subeva in the above-referenced case. On May 20, 2019, following Ms. Subeva's guilty plea, the Court ordered Ms. Subeva released on bail to her home in London, United Kingdom. Among other conditions, the Court ordered Ms. Subeva to report to defense counsel's office in London on a weekly basis, with defense counsel to provide written confirmation to Pretrial Services of each check-in.

In light of the public health crisis caused by coronavirus/COVID-19, and guidance from the Government of the United Kingdom, our firm's London-based colleagues will be working from their homes until further notice and outside guests will not be permitted in our London office during this time. Moreover, the Government of the United Kingdom now recommends against all non-essential social contact and travel. We are therefore unable to continue weekly in-person meetings without unnecessary personal risk to Ms. Subeva and our attorneys.

For the foregoing reasons, we respectfully request that the Court modify Ms. Subeva's existing bail conditions to the limited extent of suspending, until September 1, 2020, the condition that she report in person to defense counsel's offices on a weekly basis. The Government consents to this request.

Please feel free to contact me at 212-841-8860 with any questions.

**ROPES & GRAY LLP** 

The Honorable William F. Kuntz

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Respectfully submitted,

Michael G. McGovern

cc: Mark E. Bini, Esq. Hiral D. Mehta, Esq.

Robert Stehle (Pretrial Services)